

### **REMARKS/ARGUMENTS**

In response to the Examiner's further Office Action of July 18, 2007 issued with respect to the present RCE application, the Applicant respectfully submits the following Remarks.

#### ***Regarding 35 USC 103(a) Rejections***

It is respectfully submitted that the subject matter of pending independent claim 1, and claims 2-4 dependent therefrom, is not taught or suggested by any one ore more of previously cited Schalk, Stellbrink, Horikoshi and Hansen in view of newly cited Silverbrook (US 6,604,810), for at least the following reasons.

Pending independent claim 1 clearly recites that the claimed cradle includes the printhead capper drive assembly and specifically recites that this drive assembly of the cradle incorporates a rotor element drive assembly. Pending independent claim 1 also clearly recites that the removable cartridge includes the capper assembly and specifically recites that this capper assembly of the printer cartridge incorporates the rotor element.

On the other hand, contrary to the Examiner's contentions, the platen member 14, the gear 79 and the main roller drive motor are all part of the print engine assembly which is mounted to a printer at the chassis 10 (see col. 3, lines 59-65 and col. 7, line 34-col. 8, line 24), such that Silverbrook does not teach or suggest providing a cradle with a rotor element drive assembly to drive a capper assembly of a printer cartridge.

Further, contrary to the Examiner's contentions, there is no motivation for one of ordinary skill in the art to modify the disclosed arrangement of Stellbrink to incorporate the platen member of Silverbrook therein. This is because, Stellbrink specifically discloses that the inkjet cartridge 40 is moved by the carriage 1020 of the printer 1000 from the consumable cartridge 10 so that printing can take place and then moved back to the consumable cartridge for capping by the cap 100 of the consumable cartridge, like a conventional reciprocating printing system (see col. 10, lines 35-45).

Thus, it would not be possible to incorporate a print media platen face in the cap of the consumable cartridge of Stellbrink, as would be required in the Examiner's combination of Schalk, Stellbrink, Horikoshi, Hansen and Silverbrook, because the cap must be a separate component from the printing components in Stellbrink.

It is respectfully submitted that the Examiner's rejections have been traversed. Accordingly, it is submitted that the present application is in condition for allowance and reconsideration of the present application is respectfully requested.

Very respectfully,

Applicant/s:



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